

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA**

JOSHUA BONADONA

CASE NO. 1:18-cv-00224

VERSUS

JUDGE DRELL

**LOUISIANA COLLEGE AND
RICK BREWER**

MAG. JUDGE HORNSBY

MOTION FOR LEAVE TO AMEND COMPLAINT

NOW INTO COURT, through undersigned counsel, comes Joshua Bonadona who respectfully submits this *Motion for Leave to Amend Complaint* and requests that this Court grant leave to Plaintiff to amend his complaint to add the Defendants' insurer for the following reasons:

1.

The original complaint in this matter was filed on February 21, 2018. Rec. Doc. 1.

2.

Mr. Bonadona filed an Amended Complaint on March 1, 2018 prior to the filing of a responsive pleading by Defendants. Rec. Doc. 5.

3.

The Plan of Work in this matter was entered into on June 6, 2018 wherein a deadline of May 23, 2018 was established for amending pleadings and adding parties. Rec. Doc. 19.

4.

On June 21, 2018, Mr. Bonadona propounded his first set of interrogatories and requests for production of documents to Louisiana College.

5.

Louisiana College responded to the first set of discovery on August 3, 2018 wherein for the first time identified that RSUI Indemnity Company was its insurer and that coverage existed for the acts giving rise to this matter.

6.

Attached hereto is the proposed Second Amended Complaint, which merely adds RSUI Indemnity Company as a party and alleges that it is solidarily liable with the other defendants.

7.

The addition of RSUI Indemnity Company as a party would not prejudice the other defendants or RSUI Indemnity Company. Further, the addition of RSUI Indemnity Company to this action would not impact the Plan of Work.

8.

Mr. Bonadona sought the consent of the Defendants for this amendment; however, Defendants have objected to Mr. Bonadona amendment.

WHEREFORE, Plaintiff, Mr. Bonadona, prays that this Court grant him leave to file the attached *Second Amended Complaint* .

Respectfully Submitted:

The Bullman Law Firm, LLC

/s/ James R. Bullman
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 12, 2018, a copy of the above and foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system

/s/ James R. Bullman
James R. Bullman